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Attorney for Defendant, MING ZHONG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA)	No. CR-02-20145 JW
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	REMOVING TRAVEL RESTRICTIONS
vs.)	
)	
FEI YE and MING ZHONG,)	
)	
Defendants.)	
)	
)	

STIPULATION

1. On December 14, 2006, the defendant entered pleas of guilty to two counts of economic espionage. Sentencing is currently scheduled for January 14, 2008.

2. An indictment was filed in December 2002, and the defendant was released on a property bond subject to the normal travel restrictions. He has been monitored by Pretrial Services since his release without incident.

3. The defendant's employment requires that he travel in the United States. In order to avoid the necessity of repeated travel requests and orders, the defendant requests that the Court remove all travel restrictions within the United States.

1 4. Assistant United States Attorney Richard C. Cheng has been in charge of the
2 prosecution of the defendant and has no objection to the removal of the travel restrictions.

3 5. Anthony Granados of Pretrial Services has been supervising the defendant and
4 has no objection to the removal of the travel restrictions.

5 Dated: October 25, 2007

6
7
8 Dated: October 25, 2007

_____/s/_____
Assistant U.S. Attorney Richard C. Cheng

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10
11 _____/s/_____
John L. Williams

12
13
14 ORDER

15 The parties having stipulated thereto, and good cause appearing therefore, IT IS
16 HEREBY ORDERED, that all restrictions for travel within the United States are removed *for*
17 *Ming ZHONG.*

18 Dated: *11/7/07*
19

20
21 *Patricia V. Munk*
22 Magistrate Judge
23
24
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